

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
FLORENCE DIVISION**

**IN THE MATTER OF THE SEARCH OF
INFORMATION ASSOCIATED WITH
THE CELLULAR TELLPHONE
ASSIGNED TO VEHICLE
IDENTIFICATION NUMBER
1FMJU1M85PEA14418, THAT IS
STORED AT PREMISES CONTROLLED
BY AT&T**

Case No. 4:25cr632-KDW

Filed Under Seal

**AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR A SEARCH WARRANT**

I, James Cavanagh, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I make this affidavit in support of an application for a search warrant for information associated with a certain cellular telephone assigned to vehicle identification number (“VIN”) 1FMJU1M85PEA14418 (“the SUBJECT PHONE”), that is stored at premises controlled by AT&T, a wireless telephone service provider headquartered at 11760 US Highway 1, Suite 300, North Palm Beach, FL 33408. The information to be searched is described in the following paragraphs and in Attachment A. This affidavit is made in support of an application for a search warrant under 18 U.S.C. § 2703(c)(1)(A) and Fed. R. Crim. P. 41 to require AT&T to disclose to the government copies of the information further described in Section I of Attachment B. Upon receipt of the information described in Section I of Attachment B, Government-authorized persons will review the information to locate items described in Section II of Attachment B.

2. I am a Special Agent with the Federal Bureau of Investigation (FBI), United States Department of Justice, and have served in that capacity since 2019. I have served as part

of the Pee Dee Safe Streets Gang Task Force (PDSSGTF), an FBI-led violent gang and drug task force, since being assigned to the FBI's Columbia Field Office in August, 2019.

3. I am a federal law enforcement officer as defined in Title 18, United States Code, Section 2510(7). As such, I am empowered to conduct investigations of, and to make arrests for, violations of Titles 18 and 21 of the United States Code.

4. I have conducted and participated in numerous interviews with previous members of drug trafficking organizations (DTO), and in physical and electronic surveillance. In 2023, I authored four Title III affidavits and participated as lead case agent in a major narcotics and Bloods gang investigation by FBI Myrtle Beach Safe Streets Task Force, resulting in the indictment of approximately fourteen Bloods gang members and associates. I have written and executed search warrants, debriefed informants, and reviewed recorded conversations and narcotics evidence. I have been debriefed and reviewed documents associated with a 2017 narcotics and gang investigation led by the FBI Myrtle Beach office that utilized court-authorized Title III wiretaps, resulting in the indictment of multiple DTO members and/or associates. In 2019, I assisted in authoring Title III affidavits and participated as co-case agent in a major narcotics and gang investigation by FBI's Myrtle Beach office that included court-authorized Title III wiretaps of telephones and Facebook accounts, resulting in the conviction of approximately thirty Folk Nation gang members and associates. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

5. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended

to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

6. Based on the facts set forth in this affidavit, there is probable cause to believe that Rafael Contreras, a/k/a “Raphael Contreras,” a/k/a “Rafale Contreras-Ramos,” a/k/a “Gordo” (CONTRERAS) has violated 21 U.S.C. §§ 841(a)(1), 841(b)(1)(A), and, 846, and 18 U.S.C. §§ 1956(a)(1)(A)(i), 1956(a)(1)(B)(i), and 1956(h). There is also probable cause to believe that the location information described in Attachment B will assist law enforcement in arresting CONTRERAS who is a “person to be arrested” within the meaning of Federal Rule of Criminal Procedure 41(c)(4).

PROBABLE CAUSE

7. In August and September, 2020, FBI Myrtle Beach seized approximately 13 kilograms of fentanyl and fentanyl/heroin mixture from the CONTRERAS drug trafficking organization (DTO). Through the investigative efforts of law enforcement, it was determined these drugs were supplied by CONTRERAS. Additional investigation revealed the CONTRERAS DTO was involved in large-scale poly-drug trafficking and associated money laundering in the District of South Carolina and elsewhere.

8. On July 26, 2022, a federal grand jury sitting in the District of South Carolina returned an indictment against CONTRERAS charging him with a drug trafficking conspiracy, in violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(A), and 846; and a money laundering conspiracy, in violation of 18 U.S.C. §§ 1956(a)(1)(A)(i), 1956(a)(1)(B)(i), and 1956(h). The United States District Court for the District of South Carolina issued an arrest warrant for CONTRERAS on these charges.

9. As detailed below, CONTRERAS is believed to reside in Mexico. As a result, the Government sought and obtained an extradition request for CONTRERAS. As of February 22, 2024, the Department of Justice Office of International Affairs has informed me that the Mexican government has issued an arrest warrant for CONTRERAS stemming from the criminal conduct for which he was indicted in the District of South Carolina.

10. Since at least 2020, Cooperating Source 1 (CS-1)¹ has made overt attempts to assist law enforcement in locating CONTRERAS, which to date have been unsuccessful.

11. Over the course of this investigation, agents have identified CONTRERAS as the spouse of STEPHANIE MALDONADO (“MALDONADO”), who resides in Tucson, Arizona. Through information learned during debriefs of sources within the CONTRERAS DTO, consensually monitored and recorded calls with CONTRERAS, physical surveillance, and open source/law enforcement data base checks, CONTRERAS and MALDONADO have four children together and that MALDONADO periodically drives the children to see their father, CONTRERAS, who resides in Sonora, Mexico. CONTRERAS, a Mexican citizen, fled to Mexico in 2020 after overt law enforcement action was taken against members of his DTO.

12. In February 2024, CS-1 told agents that MALDONADO sold her previous vehicle and currently drives a 2023 Ford Expedition. Vehicle records provided by FBI Arizona list

¹ Agents believe CS-1 is reliable because the information he/she provided was against his/her own penal interest. Furthermore, CS-1’s relationship with STEPHANIE MALDONADO and CONTRERAS was corroborated through audio/video recorded meetings with MALDONADO and CONTRERAS, consensually monitored and recorded telephone calls, information from other CSs, and telephonic toll analysis. CS-1 has not been monetarily compensated for the information provided. CS-1 has a criminal history dating back to 2009, including a 2010 conviction for marijuana possession. CS-1 is cooperating in hopes of receiving judicial consideration.

MALDONADO as the “Registered Party” for the Target Vehicle (2023 Ford Expedition bearing VIN: 1FMJU1M85PEA14418). The records also show “5600 S Cntry Clb Rd Trlr 143; Tucson, AZ 85706-2744” as the address associated with MALDONADO.

13. CS-1 stated that MALDONADO drove the children to visit CONTRERAS as recently as December, 2023. Although law enforcement records provided by the Department of Homeland Security (“DHS”) show there were no records of MALDONADO crossing in December, 2023, MALDONADO did cross through a checkpoint at the US-Mexico border, crossing into the United States five times during January, 2024, and more than 40 times during 2023. Although the records for these crossings do not indicate if there were passengers in the vehicle, she was referred for secondary vehicle inspection four times between October, 2020 and January, 2023. During all of those inspections, the records show she had their children in the vehicle.

14. There is probable cause to believe that MALDONADO has used, and will continue to use, the Target Vehicle to visit CONTRERAS. This information would substantially assist the government in locating CONTRERAS and arresting him pursuant to the arrest warrant.

15. In my training and experience, I have learned that AT&T is a company that provides cellular telephone access to the general public. I also know that providers of cellular telephone service have technical capabilities that allow them to collect and generate information about the locations of the cellular telephones to which they provide service, including cell-site data, also known as “tower/face information” or “cell tower/sector records.” Cell-site data identifies the “cell towers” (i.e., antenna towers covering specific geographic areas) that received a radio signal from the cellular telephone and, in some cases, the “sector” (i.e., faces of the towers) to which the telephone connected. These towers are often a half-mile or more apart,

even in urban areas, and can be 10 or more miles apart in rural areas. Furthermore, the tower closest to a wireless device does not necessarily serve every call made to or from that device. Accordingly, cell-site data provides an approximate location of the cellular telephone but is typically less precise than other types of location information, such as E-911 Phase II data or Global Positioning Device (“GPS”) data.

16. Based on my training and experience, I know that AT&T can collect cell-site data about the SUBJECT PHONE. I also know that wireless providers such as AT&T typically collect and retain cell-site data pertaining to cellular phones to which they provide service in their normal course of business in order to use this information for various business-related purposes.

17. On or about February 14, 2024, a preservation request was sent to AT&T. Additionally, AT&T confirmed VIN: 1FMJU1M85PEA14418 (SUBJECT PHONE) was equipped with a “Wi-Fi hotspot” and had “3GB Data Plan” capability, indicating AT&T serviced this VIN. Based on my training and experience, I have learned that:

a. A motor vehicle telematics system, such as the one associated with VIN: 1FMJU1M85PEA14418 (SUBJECT PHONE), is typically composed of a number of hardware and software components that support navigation and enable the connectivity of the vehicle. These components may include antennas, wireless technology such as a Bluetooth antenna for connection to the operator’s cellphone, a WiFi antenna, and/or an embedded cellular connection (SIM card) for direct connectivity of the vehicle to the cellular networks, and electronics, including at least one computer, onboard a vehicle. These systems typically provide a variety of services to subscribers, such as providing navigational assistance and the ability to contact an operator and/or emergency services when assistance is needed. These systems are typically

installed in the motor vehicles at the factory or at a dealership by the vehicle manufacturer. After installation, vehicle owners or lessors typically pay a fee to a telematics service provider (often, the same company bearing the brand name of the telematics system), although free trials of such systems are sometimes offered with new vehicle purchases by some providers. Some vehicle manufacturers also include the telematics services as part of the purchase of the vehicle, without requiring a separate subscription fee to the telematics service provider.

18. Based on my training and experience, I know that wireless providers such as AT&T typically collect and retain information about their subscribers in their normal course of business. This information can include basic personal information about the subscriber, such as name and address, and the method(s) of payment (such as credit card account number) provided by the subscriber to pay for wireless telephone service. I also know that wireless providers such as AT&T typically collect and retain information about their subscribers' use of the wireless service, such as records about calls or other communications sent or received by a particular phone and other transactional records, in their normal course of business. In my training and experience, this information may assist in the identification of communication facilities associated with, and/or used by CONTRERAS, further assisting law enforcement in arresting CONTRERAS who is a "person to be arrested" within the meaning of Federal Rule of Criminal Procedure 41(c)(4).

AUTHORIZATION REQUEST

19. Based on the foregoing, I request that the Court issue the proposed search warrant, pursuant to 18 U.S.C. § 2703(c) and Federal Rule of Criminal Procedure 41.

20. I further request that the Court direct AT&T to disclose to the government any information described in Section I of Attachment B that is within its possession, custody, or control. Because the warrant will be served on AT&T, who will then compile the requested records at a time convenient to it, reasonable cause exists to permit the execution of the requested warrant at any time in the day or night.

21. I further request that the Court order that all papers in support of this application, including the affidavit and search warrant, be sealed until further order of the Court. These documents discuss an ongoing criminal investigation that is neither public nor known to all of the targets of the investigation. Accordingly, there is good cause to seal these documents because their premature disclosure may seriously jeopardize that investigation, including by giving targets an opportunity to destroy or tamper with evidence, change patterns of behavior, notify confederates, and flee from prosecution.

22. Assistant United States Attorney Katherine Hollingsworth Flynn has reviewed this affidavit.

Respectfully submitted,

James Cavanagh
Special Agent
Federal Bureau of Investigation

Subscribed and sworn to before me on February 27, 2024.



KAYMANI D. WEST
UNITED STATES MAGISTRATE JUDGE